UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF VIRGINIA ROANOKE DIVISION

In Re:

* CHAPTER 7

Lucia Koski (aka Lucia Gibson)

* CASE NO.: 18-71401

*

MOTION TO QUASH GARNISHMENT

COMES NOW your applicant, LUCIA KOSKI, by counsel, pursuant to Bankruptcy Code §362 (a) and respectfully represents:

- 1. That your applicant has filed her petition for relief under Chapter 7 of Title 11 of the United States Code;
- 2. That within 90 days of filing the above-named petition, your applicant was subject to a garnishment upon her wages issued by:

ROANOKE COUNTY GENERAL DISTRICT COURT 305 EAST MAIN STREET SALEM, VA 24153

3. That said garnishment, which has a return date of 11/14/18, is in favor of:

BARCLAYS BANK DELAWARE C/O GLASSER AND GLASSER, PLC PO BOX 3400 NORFOLK, VA 23514

4. Applicant's bank, which is the garnishee, is located at:

THE BANK OF FINCASTLE 17 SOUTH ROANOKE STREET FINCASTLE, VA 24090

5. The amount withheld to date is approximately \$120.87

Case 18-71401 Doc 7 Filed 10/19/18 Entered 10/19/18 08:30:09 Desc Main Document Page 2 of 2

WHEREFORE, your applicant prays that said garnishment be quashed, and that she have such other and further relief as the nature of her case may require.

Respectfully Submitted,

LUCIA KOSKI (AKA LUCIA GIBSON)

By: /s/ Malissa Lambert Giles
Of Counsel

Malissa Lambert Giles, Esquire Tracy Allen Giles, Esquire Heather R. Parsons, Esquire GILES & LAMBERT, P.C. Post Office Box 2780 Roanoke, VA 24001 (540) 981-9000

Certificate of Mailing

I, the above counsel, hereby certify that I have mailed a true copy of the foregoing Motion to Quash Garnishment to the creditor and the creditor's attorney, if applicable, this the 19th day of October, 2018, via first class United States Mail, postage prepaid.

Date: October 19, 2018 /s/ Malissa Lambert Giles

Of Counsel